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March 21, 2002

To: The Federal Communications Commission

RE: Docket MM 99-325 (IBOC Digitalization)

I am a listener of several low-power non-commercial stations here in the San Francisco Bay Area. I am concerned that an implementation of IBOC would cause the disruption of the signals of these stations. Among the potentially affected stations are: KKUP, KSCU, (Cupertino); KFJC (Los Altos Hills); KZXU (Stanford); KCEA (Atherton); KCSM (San Mateo); and KPOO (San Francisco).

I am filing these Reply Comments in support of THE VIRGINIA CENTER FOR THE PUBLIC PRESS. Like them, and others, we are opposed to implementation of In Band On Channel (IBOC) Digitalization. We are concerned that IBOC could displace the frequency for which we have applied, and many other frequencies as well. IBOC could displace both aspiring stations, such as ours, and established stations as well.

We urge the Commission to proceed with the Eureka-147 alternative Digitalization technology, which would avoid the displacement problem. Even then, of course, the Eureka-147 technology should first be tested and evaluated as thoroughly as the IBOC technology has been.

In no event should IBOC Digitalization be adopted without full and complete testing and evaluation of the less disruptive Eureka-147 Digitalization technology.

Sincerely,

David W. Belknap